



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

ALAMEDA COUNTY
John J. Bauters
Pauline Russo Cutter
Scott Haggerty
Nata Miley

CONTRA COSTA COUNTY
John Gioia
David Hudson
(Chair)
Karen Mitchoff
Mark Ross

MARIN COUNTY
Katie Rice
(Vice Chair)

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Hillary Ronen
Tyrone Jue
(SF Mayor's Appointee)

SAN MATEO COUNTY
David Canepa
Carole Groom
Doug Kim

SANTA CLARA COUNTY
Margaret Abe-Koga
Cindy Chavez
Liz Kniss
Rod G. Sinks
(Secretary)

SOLANO COUNTY
Pete Sanchez
James Spering

SONOMA COUNTY
Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



July 24, 2018

Richard Corey, Executive Officer
California Air Resources Board
1001 "I" Street
Sacramento, California 95814

RE: Comments on the California Air Resources Board's AB 617 Blueprint

Dear Mr. Corey,

The Bay Area Air Quality Management District (District) has reviewed the Community Air Protection Blueprint (Blueprint), which was released by the California Air Resources Board (CARB) for public comment on June 7, 2018. The Blueprint is intended to outline the state's process for meeting AB 617's requirements, and more specifically, provides details regarding the proposed process for identifying communities, statewide strategies to reduce emissions of criteria air pollutants and toxic air contaminants, as well as proposed criteria for development of community emissions reduction programs and community air monitoring campaigns.

We appreciate the opportunity to provide feedback on the draft Blueprint, and have a few overarching concerns regarding this document. First, the Blueprint adds requirements above what is stipulated in the AB 617 legislation, and likely above what is needed for successful implementation of the intent of the legislation by limiting the flexibility of Air Districts to innovate and apply new techniques. These requirements, many of them administrative, will take already strained local Air District resources away from efforts to identify and understand new air quality issues, or develop and implement emission and exposure reductions. Second, the Blueprint should better articulate the overall strategy of how the various requirements of AB 617 will lead to continued air quality improvement. While the Blueprint does provide an outline of how each individual process (monitoring, community emission reduction plans, emission inventory improvements, etc.) will be implemented, it does not outline how this structure can achieve continued exposure reductions through feedback throughout the various processes.

In addition to the broader comments above, District staff will be reaching out to CARB staff directly regarding more specific edits to the Blueprint. If you have any additional questions, please contact me or Elizabeth Yura, the Air District's Community Health Protection Officer, at eyura@baaqmd.gov. We look forward to continuing work with the state and our local communities on the successful implementation of AB 617.

Sincerely,

Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

cc: Laura Zaremba-Schmidt, California Air Resources Board
Karen Magliano, Division Chief, California Air Resources Board
Veronica Eady, Assistant Executive Officer, California Air Resources Board